

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN  
GREEN BAY DIVISION**

**WASH WORLD INC.,**

**Plaintiff,**

**v.**

**BELANGER, INC., AND  
PISTON OPW, INC. D/B/A OPW, INC.,**

**Defendants.**

**Case No. 1:19-cv-01562-WCG**

**DECLARATION OF CHRISTOPHER R. DILLON IN SUPPORT OF BELANGER,  
INC.'S CONSOLIDATED MEMORANDUM IN SUPPORT OF ITS MOTIONS FOR  
ENHANCED DAMAGES, ATTORNEY FEES, AND PREJUDGMENT INTEREST**

I, Christopher R. Dillon, declare as follows:

1. I am an attorney licensed to practice law in the Commonwealth of Massachusetts and am admitted to practice before this Court. I am a principal in the Boston office of Fish & Richardson P.C., and am one of the attorneys representing Defendant Belanger, Inc. (“Belanger”) in the above-captioned matter. I make this declaration on personal knowledge and if called as a witness could and would competently testify as to the matters stated herein.

2. Attached hereto as Exhibit 1 is a true and correct copy of the August 28, 2020, Expert Report of Dr. James Rice Concerning Invalidity.

3. Attached hereto as Exhibit 2 is a true and correct copy of WashWorld’s Responses to Belanger’s Revised First Set of RFAs, dated November 9, 2020. This document has been designated Confidential pursuant to the Protective Order and is filed under restricted view.

4. Attached hereto as Exhibit 3 is a true and correct copy of a June 12, 2020, Letter to Sherry Coley from Whitney Reichel regarding WashWorld's contentions and discovery responses.

5. Attached hereto as Exhibit 4 is a true and correct copy of a July 3, 2020, Letter to Counsel from Sherry Coley regarding discovery.

6. Attached hereto as Exhibit 5 is a true and correct copy of WashWorld's Preliminary Invalidity Contentions, dated June 1, 2020.

7. Attached hereto as Exhibit 6 is a true and correct copy of an August 10, 2022, Letter from Christopher Dillon to Sherry Coley regarding the injunction.

8. Attached hereto as Exhibit 7 is a true and correct copy of excerpts of the July 29, 2020, Deposition of Richard E. Andreas.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on August 23, 2022, at Concord, Massachusetts.

Dated: August 23, 2022

By: /s/ Christopher R. Dillon  
Christopher R. Dillon  
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